

Exhibit 5

May 5, 2014

VIA ELECTRONIC MAIL

Sean Carter, Plaintiffs' Executive Committee Co-Chair
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103-3508

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Sean:

As you know, we represent Defendants Muslim World League (MWL) and International Islamic Relief Organization (IIRO) in the above referenced matter. Further to our conference call held on February 18, 2014, during which you volunteered to provide a list of perceived deficiencies in MWL's and IIRO's document productions, we write in response to your follow-up letter dated March 14, 2014. Below we address the issues outlined in your letter and provide an update on the status of document collection and production efforts by and on behalf of MWL and IIRO.

I. Purported Process Issues & Perceived Deficiencies

A. Process Issues

At the outset, it is important to note that Plaintiffs have directed approximately **200** document requests to IIRO and **100** document requests to MWL, a great deal of which were properly objected to as overbroad or not reasonably calculated to lead to the discovery of admissible evidence. In addition, Plaintiffs have attached multiple exhibits to their document requests, which seek documents pertaining to **hundreds** of individuals and entities. Given the sheer volume of Plaintiffs' requests, it would be unduly burdensome, if not impossible, for MWL and IIRO to identify the unique request to which each and every document is responsive while ensuring that all responsive documents are reviewed and produced in a timely manner.

In light of the foregoing, it is troubling that Plaintiffs seek to criticize the efforts made by MWL and IIRO to identify the one or more requests to which the documents are responsive. Furthermore, if in fact, as you suggest, "large numbers of irrelevant" documents have been produced, that result would be a consequence of the manner in which the requests were drafted and not a consequence of any action taken by MWL or IIRO whose obligation it is to produce documents responsive to Plaintiffs' hundreds of requests. Plaintiffs appear to be pointing the finger at MWL and IIRO for a problem entirely of their own making. However, as has been made clear, we continue to push forward to review and produce the documents required and deal with the substance rather than engage in peripheral process disputes.



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MWL and IIRO will continue in their efforts, as reflected in the charts provided with each production to date, to identify the one or more requests to which the documents are responsive. Consistent with these efforts, MWL and IIRO will produce responsive documents on a rolling basis and those documents will be produced as they are kept in the usual course of business, as required by the FRCP.

B. Documents Being Collected & Reviewed

In Sections 2-5, and 7 of your March 14 letter, you provide a number of examples of purported deficiencies with the documents produced by MWL and IIRO. As you are aware, since the June 2013 reopening of discovery, counsel for MWL and IIRO have taken multiple trips overseas to review and collect documents potentially responsive to Plaintiffs' hundreds of document requests. Documents collected from the various overseas offices must be scanned and uploaded onto a review platform and then our team of Arabic-speaking attorneys must review each document to determine if it is responsive to Plaintiffs' requests. Given the difficulties and delays necessarily accompanying a global task of this nature, responsive documents are being produced on a rolling basis and gaps in the productions should not come as a surprise. Furthermore, as detailed further below, we are still in the document collection and review process and we expect that the productions since your March 14 letter and the remaining upcoming productions, which have been/will be significant, should address the specific issues you have raised in sections 2-5 and 7 of your March 14 letter.

C. Documents Relating to the Saudi Government Officials

While we take issue with the accuracy of your narrative on this issue, in response to your specific inquiry, we can clarify that neither MWL nor IIRO has "surrendered to the government of Saudi Arabia or any agency of the government of Saudi Arabia" responsive documents in their possession. At the same time, you must recognize that it is a different working environment and we must deal with these issues in accordance with the practicalities of that environment, which we are doing. The Eastern Province office was closed by government order and we do not have access to those documents without permission. In addition, there are other documents in various offices that reflect certain communications with the KSA government, and we are seeking consent with respect to those documents as well. As we stated during our February 18 conference call, we are working to secure the necessary approvals for MWL and IIRO to disclose certain documents responsive to Plaintiffs' requests and we anticipate that the approvals will be obtained in due course. Once approvals are obtained, counsel will travel to Saudi Arabia to review and collect potentially responsive documents for eventual production of responsive documents to Plaintiffs' counsel. We do not know the volume of those documents, and are, therefore, not in a position to provide additional information as to the production of any responsive documents at this time, but are working to complete the process within the deadlines set by the court. We will, of course, update you as developments warrant.



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II. Document Collection and Productions

As we have informed you, counsel for MWL and IIRO have spent months visiting and collecting additional documents from offices in the Philippines, Indonesia, Bosnia, Albania, Kosovo, Macedonia, Pakistan and Saudi Arabia (Jeddah and Makkah). Hundreds of thousands of pages of potentially responsive documents have been collected or designated from the various locations. MWL and IIRO have added substantial resources in the review of these documents, which are almost exclusively in Arabic. Production of responsive documents began on September 6, 2013, and will continue on a rolling basis until complete. To date, our office has made 12 productions totaling over 100,000 pages of responsive material. The foregoing document collection process, although substantial, is not yet complete. Counsel for MWL and IIRO plan return to Saudi Arabia this month to complete the collection process and, consistent with their obligations, MWL and IIRO will continue to produce responsive documents on a rolling basis until all responsive documents have been produced.

III. Meeting of Counsel for the Parties

We trust that the foregoing addresses the issues raised in your March 14 letter and look forward to working with Plaintiffs' counsel to resolve any issues that remain. Should you wish to discuss any of these issues further, we suggest that the parties schedule a meeting or conference call and kindly request that you provide possible dates for any such discussion.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aisha B", with a long, sweeping horizontal line extending to the right.

Aisha Bemby

cc: Robert Haefele, Esq.